Gregory Kafoury, OSB No. 741663

kafoury@kafourymcdougal.com

Mark McDougal, OSB No. 890869

mcdougal@kafourymcdougal.com

Jason Kafoury, OSB No. 091200

jkafoury@kafourymcdougal.com

Kafoury & McDougal

411 SW Second Avenue, Suite 200

Portland OR 97204 Phone: (503) 224-2647 Fax: (503) 224-2673

Attorneys for Plaintiff

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

## PORTLAND DIVISION

CHRISTOPHER GARZA,

Case No. 3:22-cv-00721-HZ

Plaintiff,

PLAINTIFF'S ITEMIZED LIST OF ECONOMIC DAMAGES

VS.

CITY OF SALEM, an Oregon municipal corporation; and OFFICER DAVID BAKER, an individual,

Defendants.

Plaintiff submits the following itemized list of economic damages in the form of medical expenses.

<u>Provider</u>	DOS	Charges
St. Moscati	9/17/2021	\$212.00
	9/24/2021	\$212.00
	11/29/2021	\$301.00
	8/22/2022	\$301.00
Sub Totals		\$1,026.00

<u>Provider</u>	DOS	Charges
<b>Hope Orthopedics of Oregon</b>	10/4/2021	\$265.00
	10/29/2021	\$1,164.00
	10/29/2021	\$699.00
	10/29/2021	\$661.00
	11/1/2021	\$265.00
	12/3/2021	\$155.00
	12/7/2021	\$1,760.00
	12/7/2021	\$1,837.00
	12/7/2021	\$1,000.00
	12/7/2021	\$1,000.00
Sub Totals		\$8,806.00
Willamette Surgery Center	12/7/2021	\$6,191.00
		Φ. 101 00
Sub Totals	- / /- /	\$6,191.00
Salem Radiology	9/20/21	\$100.00
	9/20/21	\$100.00
	9/5/23	\$100.00
Sub Totals		\$300.00
Fred Meyer Pharmacy	9/20/21	\$14.99
-	10/13/21	\$3.62
	11/4/21	\$10.13
	12/7/21	\$22.94
	12/17/21	\$8.94
	1/22/22	\$23.45
	1/30/22	\$10.82
	2/9/22	\$7.57
Sub Totals		\$102.46
Future Medical Treatment:		\$60,000
Sub Totals		\$60,000
Grand Totals		\$76,425.46
Grand Totals		Ψ10,740.70

Plaintiff will testify as to the damages; Dr. Mallik Tella will testify as to future medical treatment costs, and these expenses will be introduced through Exhibit 9.

DATED this 2nd day of October, 2023.

KAFOURY & MCDOUGAL

/s/ Jason Kafoury

Jason Kafoury OSB# 091200 jkafoury@kafourymcdougal.com Of Attorneys for Plaintiff

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PLAINTIFF'S ITEMIZED LIST OF

**ECONOMIC DAMAGES** on the defendant(s) on the date indicated below by the following method: ☐ mailing with postage prepaid ☐ hand delivery ☐ facsimile transmission □ overnight delivery **≥** email to said person(s) a true copy thereof, addressed to said persons at their last known address(es) and facsimile number(s) as follows: Sebastian Tapia Salem City Attorney's Office 555 Liberty St SE, Ste 225 **Salem OR 97301** stapia@cityofsalem.net mhighsmith@cityofsalem.net rgostevskyh@cityofsalem.net Attorneys for Defendants Dated this 2nd day of October, 2023. KAFOURY & MCDOUGAL /s/ Jason Kafoury Jason Kafoury, OSB #091200 jkafoury@kafourymcdougal.com Of Attorneys for Plaintiff